

1 THE HONORABLE JAMES L. ROBART
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7 UNITED STATES DISTRICT COURT
8 FOR THE WESTERN DISTRICT OF WASHINGTON
9 AT SEATTLE

10 UNITED STATES OF AMERICA

11 Plaintiff,

12 vs.

13 CITY OF SEATTLE

14 Defendant.

15 CASE No. C12-1282JLR

16 **STIPULATED MOTION AND
[PROPOSED] ORDER
EXTENDING THE DEADLINE
FOR THE PARTIES TO FILE ITS
COMMENTS TO THE CITY'S
DRAFT ACCOUNTABILITY
LEGISLATION**

17 (Please Note on Calendar for:
18 October 27, 2016)

19 The United States of America and the City of Seattle (the "City," together the "Parties")
20 respectfully move this Court to extend the deadline for the Parties to file their comments to the
21 City's Draft Legislation by one (1) week, until November 4, 2016, for the following reasons:

22 **BACKGROUND**

23 On September 9, 2016, the Court ordered the City to present its draft legislation concerning
24 the Seattle Police Department's ("SPD") accountability systems to the Court ("Draft Legislation")
25 by October 7, 2016. Dkt. No. 310. The Court further indicated that "[t]he parties will have 21
days following the City's submission to provide comment to the court on the City's draft
legislation." *Id.*

STIPULATED MOTION AND [PROPOSED] ORDER EXTENDING
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UNITED STATES ATTORNEY
700 Stewart Street, Suite 5220
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In accordance with the Court's order, the City filed its Draft Legislation on October 7, 2016. Dkt. No. 320-1.

Upon receipt of the City's Draft Legislation, counsel for the United States Department of Justice ("DOJ") affirmatively reached out and engaged all City stakeholders in several hours of meetings to understand better each of the 260+ paragraphs of the document. More specifically, DOJ met with representatives from the Community Police Commission, the OPA Auditor, the OPA Director, the elected Seattle City Attorney and his staff, as well as, informally, members and staff of the City's executive and legislative branches. DOJ also solicited the views of other senior members of SPD. Finally, DOJ also met with the Monitor and obtained some of his current views of the Draft Legislation.

The DOJ is now considering those perspectives and preparing its comments to the Draft Legislation. That process would benefit from a short extension of time to ensure those comments provide the Court with a complete review of all the relevant information.

The Parties do not believe that this short extension of time would seriously prejudice the Parties or this important process. As the Court indicated in a prior order, the Court will endeavor to review the legislation, within 90 calendar days of its receipt of the proposed legislation (*viz.*, October 7), to ensure that it does not conflict with the terms or purpose of the Consent Decree. Dkt. No. 305 at 3. DOJ respectfully submits that a one-week extension of time for the Parties' comments to this Draft Legislation should not interfere with that timing.

The Monitor does not oppose this requested extension.

STIPULATION

For these reasons, the Parties respectfully request that the Court extend the deadline for the Parties to file their comments to the City's Draft Legislation by one (1) week, until November 4, 2016.

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1 //

2 DATED this 27th day of October, 2016.

3 For the UNITED STATES OF AMERICA:

4 ANNETTE L. HAYES
5 United States Attorney for the
6 Western District of Washington

7 s/J. Michael Diaz

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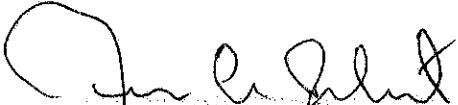
1 **[PROPOSED] ORDER**

2 The Court hereby approves extending the deadline for the Parties to provide their
3 comments to the City's Draft Legislation by one week, until November 4, 2016.

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5 DONE IN OPEN COURT this 28th day of Oct., 2016,

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THE HON. JAMES L. ROBART

8 UNITED STATES DISTRICT COURT JUDGE

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CERTIFICATE OF SERVICE

I certify that on the 27th day of October, 2016, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to the following attorneys of record:

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UNITED STATES ATTORNEY
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1 DATED this 27th day of October, 2016.
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